

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

LIBERTY MUTUAL INSURANCE
COMPANY, et al.,

Plaintiffs,

v.

ROBERT H. HURLBUT, et al.,

Defendants.

Civil Action No. 08 CV 7192

NOTICE OF
MOTION TO ADMIT
JEFFREY M. THEODORE
PRO HAC VICE

PLEASE TAKE NOTICE that, upon the annexed affidavit of Evan Glassman in support of this motion and the Certificates of Good Standing annexed thereto, Plaintiffs will move this Court, at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the admission of Jeffrey M. Theodore, an associate of the firm of Steptoe & Johnson LLP, as attorney *pro hac vice* for Plaintiffs in this matter.

Dated: New York, New York
August 12, 2008

STEPTOE & JOHNSON LLP

By: Evan Glassman
Evan Glassman
750 Seventh Avenue, Suite 1900
New York, NY 10019
(212) 506-3900

Attorneys for Plaintiffs

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FOR THE SOUTHERN DISTRICT OF NEW YORK**

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**AFFIDAVIT IN SUPPORT OF
MOTION TO ADMIT
JEFFREY M. THEODORE
PRO HAC VICE**

EVAN GLASSMAN states as follows:

1. I am a member of the Bar of this Court and of the firm of Steptoe & Johnson LLP.

I make this affidavit in support of Plaintiffs' motion for the admission of Jeffrey M. Theodore to practice *pro hac vice* as counsel for Plaintiffs in the above-captioned case.

2. Mr. Theodore is an associate with Steptoe & Johnson LLP, resident in our District of Columbia office. Mr. Theodore is a member in good standing of the Bars of the District of Columbia and the State of Maryland. (A certified copy of Mr. Theodore's certificate of good standing in the Bar of the District of Columbia is annexed hereto as Exhibit A; a certified copy of Mr. Theodore's certificate of good standing in the Bar of the State of Maryland is annexed hereto as Exhibit B.) Mr. Theodore has advised me that he is familiar with the Federal Rules of Civil Procedure and with the Local Rules of this Court.

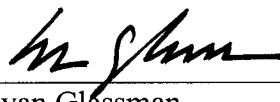
3. In addition, I have worked with Mr. Theodore and I can personally attest that he is competent and of good character.

4. There are no pending disciplinary proceedings against Mr. Theodore in any State or Federal Court.

5. Wherefore, I respectfully request that Jeffrey M. Theodore, Esq., be admitted to practice *pro hac vice* as counsel for Plaintiffs in the above-captioned case.

6. Pursuant to 28 U.S.C.A. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
August 12, 2008



Evan Glassman
STEPTOE & JOHNSON LLP
750 Seventh Avenue
New York, New York 10019
(212) 506-3900

Attorney for Plaintiffs



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JEFFREY M. THEODORE

was on the 6th day of AUGUST, 2007

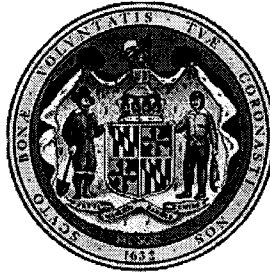
duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 25, 2008.

GARLAND PINKSTON, JR., CLERK

By: *N. Charles*
Deputy Clerk

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the thirteenth day of December, 2006,*

Jeffrey Michael Theodore

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twenty-fifth day of July, 2008.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland

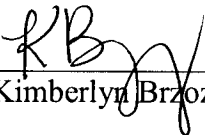
CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing and the accompanying Declaration of Evan Glassman was served on August 13, 2008 via electronic mail on the following counsel of record:

Mark D. Rosenzweig, Assistant Attorney General
Litigation Bureau, NYC
Office of the Attorney General, State of New York
120 Broadway
New York City, NY 10271

Richard Brewster, Assistant Attorney General
Litigation Bureau, NYC
Office of the Attorney General, State of New York
120 Broadway
New York City, NY 10271

Counsel for Defendants



Kimberlyn Brzozowski

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[PROPOSED] ORDER FOR
ADMISSION PRO HAC VICE

The motion for admission *pro hac vice* in the above-captioned matter is granted. The admitted attorney, Jeffrey M. Theodore, is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 per attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission *pro hac vice* for the above-listed case will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

Dated: New York, New York
_____, 2008

S O O R D E R E D:

U.S.D.J